

**Freshfields Bruckhaus Deringer US LLP****Via ECF**

The Honorable P. Kevin Castel
 United States District Judge
 Southern District of New York
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April 19, 2024

Re: *In re Google Digital Advertising Antitrust Litigation*, 1:21-md-03010 (PKC); *In re Google Digital Advertising Antitrust Litigation*, No. 21-cv-07001 (PKC); *Singh v. Google LLC et al.*, No. 23-cv-03651 (PKC); *Stellman v. Google LLC et al.*, No. 23-cv-01532 (PKC); *In re Google Digital Publisher Litigation*, No. 21-cv-07034 (PKC)

Dear Judge Castel:

Pursuant to Your Honor's March 26, 2024 Pre-Trial Order No. 10 (ECF No. 736), we write on behalf of Defendants Google LLC, Alphabet Inc., and YouTube LLC (together, "Google") to report that Google and the Advertisers Plaintiffs,¹ Plaintiff Sunny Singh, and Plaintiff Michael Stellman have reached agreement on stipulations concerning certain of these plaintiffs' state law claims. The agreed stipulations are attached hereto as **Exhibit A** and **Exhibit B**. Additionally, we write to report that the Publisher Plaintiffs² have agreed not to pursue state law claims based on the allegations regarding Search+ and/or malicious code (i.e., Acts 14 and 16 alleged in their complaint, ECF No. 408), which Publisher Plaintiffs had previously represented to the Court they were amenable to dismissing. See ECF No. 730 at 1; ECF No. 736 at 1-2. Publisher Plaintiffs' agreement is attached hereto as **Exhibit C**. In accordance with Rule 1.A of the Court's Individual Practices, we note there is no conference currently scheduled before the Court.

¹ The Advertiser Plaintiffs are defined as Hanson Law Office, Cliffy Care Landscaping, Inc. and Kinin, Inc., collectively. Vitor Lindo, Raintree Medical and Chiropractic Center, LLC and Rodrock Chiropractic PA were also named Advertiser Plaintiffs at the time of filing (ECF No. 399). These plaintiffs later voluntarily dismissed their claims against Defendants on March 17, 2023 (ECF Nos. 509-10).

² The Publisher Plaintiffs are defined as Genius Media Group, Inc. (k/n/a MediaLab AI, Inc.), Sterling International Consulting Group, The Nation Company, LLC, The Progressive, Inc., JLaSalle Enterprises LLC, and Mikula Web Solutions, Inc.

*The Publisher Plaintiffs state
 how claims regarding
 Search+ and/or malicious
 code (i.e. Acts 14 and 16
 alleged in their
 complaint) are
 dismissed
 with
 prejudice
 SO
 ORDERED
 5-2-24*

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Sincerely,

/s/ Justina K. Sessions

Justina K. Sessions